

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IRON WORKERS' MID-AMERICA )  
PENSION PLAN, *et al.*, )  
Plaintiffs, ) CIVIL ACTION  
vs. ) NO. 23 C 2477  
ADVANCED STEEL ERECTORS, LLC, )  
an Illinois limited liability company, ) JUDGE MATTHEW F. KENNELL  
Defendant. )

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

Plaintiffs, by their attorneys, and pursuant to Federal Rule of Civil Procedure Rule 55(b), move for entry of judgment by default against Defendant, ADVANCED STEEL ERECTORS, LLC, an Illinois limited liability company, in the total amount of \$142,109.30, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$3,249.00.

On April 24, 2023, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Lyle Neeman, Clerk) at the registered office of record (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on May 15, 2023. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment pursuant to F.R.Civ.P. Rule 55(b).

/s/ Patrick N. Ryan

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 12th day of July 2023:

Advanced Steel Erectors, LLC  
c/o IL Corporation Service Co., Registered Agent  
1801 Adlai Stevenson Drive  
Springfield, IL 62703

Mr. Michael Ahern  
Advanced Steel Erectors, LLC  
9320 Corsair Road  
Frankfort, IL 60423-2548

/s/ Patrick N. Ryan

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